

NOV 24 2002

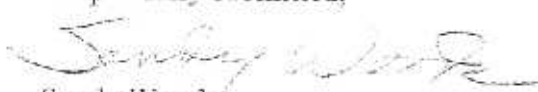
U.S. Department of State, CA/OCS/PRI
Adoption Regulations Docket Room
SA-29
2201 C Street, N.W., Washington, DC 20520

Comments in reference to docket number State/AR-01/96

As an adoptive parent and an adoption professional for the past four years, I want to offer the following suggestions regarding the proposed regulations:

1. Lower the \$1,000,000 minimum limit requirement on adoption agency liability insurance. This insurance has become increasingly expensive during the past few years. I believe this high limit could encourage unnecessary lawsuits to be filed against agencies, particularly hurting the smaller agencies.
2. Eliminate the requirement for agencies to carry 3 months of operating expenses. As with many small agencies, as is the one I work with, we are heavily dependent on donations in addition to fees. Add to this the fluctuating economy as well as the uncertainty of international adoption programs, these factors may very well prevent us from being able to fulfill this requirement. I believe this will force many small agencies to go out of business.
3. Allow more time for state licensing entities and organizations other than the COA to become accrediting entities for the Hague regulations. I believe it is important to have more than one or two alternatives to help provide a safeguard against exorbitant accrediting fees.
4. Reduce the requirement that Home Study caseworkers have a Masters degree. I believe the key is the life experience of the worker and their commitment to training the adoptive couple. I think that either a Bachelors degree, or documented training and experience should suffice. It is not feasible for every Home Study caseworker to have a Masters degree. A Masters degree does not insure more quality than a person who has learned from years of experience.
5. I urge that these regulations be rewritten AND republished BEFORE becoming final.

Respectfully submitted,


Sandy Woods
HOPE for Children, Inc.